

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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**HEATHER NELSON,**

**Plaintiff,**

**v.**

**SANTANDER CONSUMER USA, INC.,  
PATRICK K. WILLIS CO., INC., d/b/a/  
AMERICAN RECOVERY SERVICE, and  
ASSETSBIZ CORP., d/b/a ABC  
RECOVERY,**

**Defendants,**

**Case No.: 11-cv-307**

**PLAINTIFF'S PROPOSED VOIR DIRE  
QUESTIONS**

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**SANTANDER CONSUMER USA, INC.,**

**Counter-Plaintiff,**

**v.**

**HEATHER NELSON,**

**Counter-Defendant.**

Plaintiff, Heather Nelson, proposes the Court ask the following questions for voir dire.

**Plaintiff's Requested Voir Dire Question Number 1:**

Are any of you or have any of you been engaged in or employed by a business or collection agency which collects debts, or who have family members or close friends who are so employed?

**Plaintiff's Requested Voir Dire Question Number 2:**

Are any of you now, or have any of you ever been, engaged in or employed by a business or individual who refers accounts to a debt collector for collection, or do you have family members or close friends who have ever been so employed?

**Plaintiff's Requested Voir Dire Question Number 3:**

Are any of you now, or have any of you ever been, engaged in or employed by a business or individual which extends or collects credit, like a bank, credit union, or finance company, or do you have family members or close friends who have ever been so employed?

**Plaintiff's Requested Voir Dire Question Number 4:**

Are any of you now, or have any of you ever been, engaged in or employed by a business or individual which is involved in the business of repossessing vehicles, or do you have family members or close friends who have ever been so employed?

**Plaintiff's Requested Voir Dire Question Number 5:**

Would any of you be unable or unwilling to award damages to someone who has suffered emotional distress or mental anguish?

**Plaintiff's Requested Voir Dire Question Number 6:**

Would any of you be unable or unwilling to award punitive damages if the evidence showed a basis for them?

**Plaintiff's Requested Voir Dire Question Number 7:**

Is there anyone here that believes a debt collector does not have to treat a person with respect and dignity just because that person might owe money to the debt collector?

**Plaintiff's Requested Voir Dire Question Number 8:**

Have any of you ever owned a business? If yes, briefly describe the size and type of business.

Dated this 10<sup>th</sup> day of May, 2013.

s/ Ivan Hannibal

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